

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ANYWHERECOMMERCE, INC. and BBPOS
LIMITED,

Plaintiffs,

v.

INGENICO INC., INGENICO CORP., and
INGENICO GROUP SA,

Defendants.

Civil Docket No: 1:19-cv-11457-IT

EXPEDITED REVIEW REQUESTED

**DEFENDANTS' EMERGENCY MOTION FOR LEAVE TO FILE
MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT IN EXCESS OF TWENTY PAGES**

Pursuant to Rule 7.1(b)(4) of the Local Rules of the United States District Court for the District of Massachusetts, Defendants Ingenico Inc., Ingenico Corp., and Ingenico Group SA (collectively "Defendants") respectfully move for leave to file a memorandum in opposition to Plaintiff's motion for summary judgment in excess of 20 pages double spaced, but not to surpass 40 pages. Defendants will file their memorandum on July 13, 2022. In support of this Motion, Defendants aver the following:

1. Rule 7.1(b)(4) provides that memoranda supporting or opposing motions shall not exceed 20 pages without leave of court.
2. Defendants require more than 20 pages to adequately respond to the arguments set forth in Plaintiffs' 39-page Memorandum of Reasons in Support of Their Motion for Summary Judgment on Ingenico Inc.'s Second Amended Counterclaims (Doc. No. 190) and believe that the additional pages will assist the Court in deciding Plaintiffs' motion for summary judgment.
3. Defendants have conferred with Plaintiffs' counsel regarding the relief sought herein. Plaintiffs' counsel has no objection and may request the same relief in connection with

Plaintiffs' anticipated memorandum in opposition to Defendants' motion for summary judgment that Plaintiffs' have represented they will file.

WHEREFORE, Defendants respectfully request an Order from this Court granting Defendants leave to file a memorandum in opposition to Plaintiffs' motion for summary judgment in excess of 20 pages, but not to surpass 40 pages.

INGENICO INC., INGENICO CORP. AND
INGENICO GROUP, SA,

By their attorneys,

/s/ Jeffrey K. Techentin
JOHN A. TARANTINO (BBO #492230)
PATRICIA K. ROCHA (BBO #542348)
NICOLE J. BENJAMIN (BBO #666959)
JEFFREY K. TECHENTIN (*pro hac vice*)
Adler Pollock & Sheehan P.C.
One Citizens Plaza, 8th Floor
Providence, RI 02903
Tel: (401) 274-7200
Fax: (401) 351-4607
jtarantino@apslaw.com
procha@apslaw.com
nbenjamin@apslaw.com
jtechentin@apslaw.com
Dated: July 5, 2022

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2022, I caused to be served via electronic mail a true copy of the within document on the following counsel of record:

Jonathon D. Friedmann, Esq.
Robert P. Rudolph, Esq.
Rudolph Friedmann LLP
92 State Street
Boston, MA 02109
JFriedmann@rflawyers.com
RRudolph@rflawyers.com

Oliver D. Griffin, Esq.
Peter N. Kessler, Esq.
Melissa A. Bozeman, Esq.
Kutak Rock LLP
303 Peach Street, N.E., Suite 2750
Atlanta, GA 30308
Oliver.griffin@kutakrock.com
Peter.kessler@kutakrock.com
Melissa.bozeman@kutakrock.com

Ricardo G. Cedillo, Esq.
755 E. Mulberry Ave., Ste 500
San Antonio, Texas 78212
rcedillo@lawdcm.com

/s/ Jeffrey K. Techentin
Jeffrey K. Techentin

Rule 7.1(a)(2) Certification

I certify that counsel for Defendants conferred in good faith with counsel for Plaintiffs to narrow the areas of disagreement to the greatest possible extent. Plaintiffs' counsel represented that she will not object to this Motion.

/s/Jeffrey K. Techentin